

This comment on the pending "Phase II" enhanced 911 (E911) services proceeding is submitted by CellPoint Inc., a global provider of mobile location technology and services for GSM cellular networks. CellPoint has been closely following the events leading up to the October 1, 2001 deadline for the Phase II E911 implementation mandate. The waiver applications filed focus on the alleged unavailability of network components, handsets and software. For GSM carriers, this is not correct; CellPoint has the location technology and platform available today that would enable immediate roll-out of E911 solutions, nation-wide and for every mobile phone in a GSM network, and without modified handsets or new network components. Most importantly, user-controlled privacy has been paramount in the design and development of CellPoint's location solutions.

It cannot be doubted that E911 implementation is an important public policy goal. Last week, Telecommunications Reports (Volume 67, No. 36, p. 13) reported that sixteen members of the U.S. House of Representatives have urged the Commission to hold firm to the October 1, 2001 deadline for beginning deployment of Phase II E911 services. As the lawmakers noted, E911 deployment rules were adopted in 1996 and that the requests for waivers filed by several carriers are excuses for delay when more than adequate notice of the rules' implementation has been given.

CellPoint believes that the argument that there is currently no available technology to implement Phase II in GSM networks is incorrect. CellPoint has a network-wide mobile location solution installed in Germany with mobile operator E-Plus, several commercial location systems installed in other GSM networks and is working with many other mobile operators to deploy network-wide location platforms. This is a cost-effective solution for any GSM operator, anywhere in the world. CellPoint's Mobile Location System (MLS) provides operators with a solution that utilizes CellPoint's Enhanced Cell-ID positioning technology in the immediate term, and when combined with Assisted GPS positioning technology from companies such as SiRF Technology, Inc., which is currently being integrated into MLS, GSM carriers have the technology and the roadmap to meet the Phase II Mandate through seamless migration to hybrid E-Cell-ID and Assisted GPS.

The MLS System itself supports location of any mobile phone while in both active and idle mode, and is 100% compatible with GSM and UMTS standards. Under these circumstances, there is no reason to delay Phase II implementation in the face of the compelling public policy concerns underlying E911 and the five years' delay that has already ensued. Common sense must prevail.

Although it is understandable that carriers may want to wait for other options that are not yet viable today, this is no excuse to delay implementation of a perfectly sound, secure and robust carrier-grade solution today. CellPoint's MLS has an open interface to implement possible future positioning technologies to work in parallel with E-Cell-ID and A-GPS. This reticence to deploy an E-Cell-ID platform such as CellPoint's MLS cannot be a cost concern; CellPoint's Mobile Location System is not a costly overlay solution, runs on standard, cost-effective hardware from Sun Microsystems and does not require a huge investment in customized or high-end computers. Additionally, it can be installed, tested and put into live commercial operation within a matter of weeks.

A vitally important area of concern for subscribers and carriers alike is

that of user privacy and network security. From its inception, MLS has been built with user-controlled privacy integral to the location system. Now, through CellPoint's Mobile Location Broker (MLB), data residing within carrier's trusted domain is thoroughly protected from any third-party location applications and services. This powerful combination of privacy and security functionality ensures that carriers can be assured in the knowledge that their data assets are protected. At the same time, subscribers need not worry about any 'Big Brother' implications of using next-generation location-based services -the user most definitely owns his or her location.

CellPoint's solution is software-based and network-based. In short, operators can be up and running with an E911 solution certain not to become obsolete and that is scalable, at a reasonable cost, within weeks and without having to upgrade or change their network infrastructure, now or in the future. These are compelling arguments to examine CellPoint's proven location solution - fast implementation, cost-effective, network-based, proven technology.

Meeting the requirements of the Phase II Mandate is not difficult or impossible in the short term. CellPoint and its partners have a workable solution today for GSM operators to meet the Commission's objectives. In view of the lengthy delay already occasioned and the important public policy objectives behind the E911 Mandate, we urge that the October 1, 2001 implementation deadline remain in place.

Sincerely,

CellPoint Inc.

/s

Peter Henricsson  
Chairman and CEO

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